

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UBIQUITI NETWORKS, INC.,)	
)	
Plaintiffs,)	
)	
v.)	No. 18-CV-5369
)	
CAMBIUM NETWORKS, INC.)	Judge Feinerman
CAMBIUM NETWORKS, LTD.)	
BLIP NETWORKS, INC.)	
WINNCOM TECHNOLOGIES, INC.,)	
SAKID AHMED, and)	
DMITRY MOISEEV,)	
)	
Defendants.)	

JOINT MOTION FOR LEAVE TO EXCEED LOCAL RULE 7.1 PAGE LIMIT

Plaintiff Ubiquiti Networks, Inc. (“Ubiquiti”) and Defendants Cambium Networks, Inc. (“Cambium”), Cambium Networks, Ltd., Blip Networks, Inc., Winncom Technologies, Inc., Sakid Ahmed, and Dmitry Moiseev (“Defendants”) jointly request leave to file briefs in support of and in opposition to the motion to dismiss that Defendants will file, which exceed the 15 page limit of Local Rule 7.1.

1. Ubiquiti filed this action on August 7, 2018 seeking injunctive relief and damages from Defendants. (DKT #1.)

2. On August 30, 2018 Ubiquiti consented to a motion by Cambium for a 45 day extension of time to respond to the Complaint, which was granted by the Court on August 31, 2018. (DKT # 17, 19.)

3. Defendants have informed Ubiquiti that they intend to file a motion to dismiss and believe that in order to address the breadth of issues raised by the Complaint, they will need

an additional 15 pages beyond the 15 page limit set by Local Rule 7.1, and therefore request leave to file a single brief in support of their motion to dismiss that will not exceed 30 pages.

4. Ubiquiti does not object to Defendants' request for additional pages for a motion to dismiss, but Ubiquiti requests an equal extension of the page limit to respond to the motion. Defendants do not object to Ubiquiti having an equal extension.

5. In support of the motion, the parties state as follows:

6. Ubiquiti is a publicly traded company that manufactures broadband internet products for enterprise and wireless internet service provider customers. Cambium also provides broadband internet products and services to commercial and governmental customers, and Cambium Networks, Ltd. is its parent company. Blip Networks, LLC provides wireless broadband internet access to customers in Illinois, and Winncom Technologies distributes networking products. Sakid Ahmed is Cambium's Director of Engineering and Dmitry Moiseev is its Principal System Engineer.

7. Ubiquiti has asserted a total of 15 claims for relief against Defendants on the basis of allegations relating to Ubiquiti M-series devices, firmware and associated licenses on the one hand, and Cambiums' and other defendants' conduct with respect to those M-series devices, firmware and licenses when in their possession and when deployed by Ubiquiti customers, on the other hand. Counts are asserted under the Computer Fraud and Abuse Act (with seven subcounts); the Digital Millennium Copyright Act (with three subcounts); the Illinois Computer Crime Prevention Law; the Copyright Act; the Lanham Act, asserting theories of false advertising, trademark infringement and false designation of origin; the Racketeering Influenced and Corrupt Organizations Act; and common law claims including breach of contract, tortious interference with contract, unfair competition, intentional interference with prospective

economic advantage, trademark infringement, and misappropriation. The complaint runs 74 pages and includes 398 paragraphs of allegations and includes several supporting exhibits.

8. Defendants believe that they cannot adequately address the breadth of issues raised by the Complaint within the 15 page limit set by Local Rule 7.1, and therefore request leave to file a single brief in support of their motion to dismiss that will not exceed 30 pages.

9. The parties also request that Ubiquiti be granted leave to file in response to Defendants' motion a brief that will not exceed 30 pages.

Accordingly, the parties jointly request that each side be granted leave to file a supporting and a response brief that exceed the 15-page limit set by Local Rule 7.1, but which shall not exceed 30 pages.

Respectfully Submitted,

UBIQUITI TECHNOLOGIES, LLC

By: /s/ Elizabeth B. Herrington
One of Its Attorneys

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CAMBIUM NETWORKS, INC.,
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WINNCOM NETWORKS, INC.,
SAKID AHMED, and DMITRY MOISEEV

By: /s/ James P. Fieweger
One of their attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on September 26, 2018, I electronically filed the foregoing **Joint Motion for Leave to Exceed Local Rule 7.1 Page Limit** with the Clerk of the Court using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users

/s/ James P. Fieweger

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